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Attorney for Plaintiffs

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Attorney for Defendants

**UNITED STATES FEDERAL COURT  
NORTHERN DISTRICT OF CALIFORNIA**

Saenz, et. al.,

Plaintiff,

vs.

Sitannand, et. al.,

Defendants

Case No.: 5:10-cv-05150-HRL

**STIPULATION TO CONTINUE THE  
INITIAL CASE MANAGEMENT  
CONFERENCE FOR 30 DAYS; and**

**~~PROPOSED~~ ORDER**

Current CMC Date and Time

Date: 4/5/2011

Time: 1:30 PM

Judge: Hon. Howard R. Lloyd

Parties, through counsel, submit the following stipulation to continue the initial case management conference for three (3) weeks:

1. This is a wage and hour action in which Plaintiffs seeks recovery of unpaid overtime, damages under the Fair Labor Standards Act, meal period premiums and related penalties and fees.

2. This matter is currently set for an Initial Case Management Conference before this Court on 4/5/2011 at 1:30 PM in front of the Hon. Howard R. Lloyd.
3. At this time, all Defendants have been served and are prepared to participate in this defense of this action.
4. All named Defendants are currently represented by the above-named counsel.
5. Counsel for Defendants and counsel for Plaintiffs have duly conferred in preparation for the upcoming case management conference.
6. It is the opinion of defense counsel that the Defendants would be best served by attempting to resolve this matter as promptly as possible.
7. Further, parties are in agreement that the cost and expense of unnecessary litigation should be avoided if at all possible.
8. Defendants have represented that, prior to making their answer, the case may be resolved by amicable settlement.
9. Defendants, therefore have expressed desire to continue the case management conference in order to accommodate some negotiation before filing a answer.
10. Though it is early in the litigation, Plaintiffs are willing to allow for this to occur.
11. As such, the parties hereby stipulate to continue the initial CMC for 3 weeks, until Tuesday, 4/26/2010 at 1:30 PM.
12. If the parties are unable to resolve their dispute, Defendants shall file answer prior to this date and time.

Dated: March 29, 2011

By: /s/Adam Wang  
Adam Wang  
Law Office of Adam Wang  
Attorneys for Plaintiff

*mle Bajoria*

Dated: March 29, 2011

By: /s/Mahesh Kumar Bajoria  
Mahesh Kumar Bajoria  
Attorney for Defendants

~~PROPOSED~~ ORDER

**GOOD CAUSE APPEARING**, this court hereby orders that the Case Management

Conference currently set for 4/5/2011 be continued until 4/26/11 at 1:30 PM.

**The parties' joint case management statement shall be filed by April 19, 2011.**

**Each party shall file a consent or declination to proceed before a United States Magistrate Judge by April 19, 2011.**

Dated: March 30, 2011

By:   
Hon. Howard R. Lloyd  
CA Northern District Magistrate Judge